

EXHIBIT B

Bryan Tyson

From: Ascarrunz, Veronica <VAscarrunz@mofo.com>
Sent: Friday, May 14, 2021 7:55 PM
To: Bryan Tyson; Hedgecock, Lyle F.; Conaway, Jenna B.; cheryl.ringer@fultoncountyga.gov; vrusso@robbinsfirm.com; cmiller@robbinsfirm.com; adenton@robbinsfirm.com; Jonathan Crumly; James Balli; Dal Burton; Diane LaRoss; Bryan Jacoutot; Loree Anne Paradise; Cross, David D.; Bruce Brown; Rob McGuire; Cary Ichter; Halsey G. Knapp, Jr.; Adam M. Sparks; Kaiser, Mary; Manoso, Robert W.; Brogan, Eileen M.; Josh Belinfante
Subject: RE: Curling v. Raffensperger, No. 1:17-cv-2989-AT (N.D. Ga.)

Bryan,

Your letter does not address the below from David's letter to you of April 22, 2021, which we take to mean that we understand your position correctly and so will raise these issues with the Court.

We also understand that you will not produce (i) documents with appropriate metadata, (ii) Dominion EMS DVD files, (iii) any documents concerning Dominion, (iv) documents related to EMS databases, (v) any fully-configured EMS, (vi) any fully-configured ICC, or (vii) any BMD equipment or peripherals. Please let me know if that understanding is incorrect before we raise these issues with the Court, which we intend to do expeditiously if needed.

Best,
Veronica Ascarrunz

From: Bryan Tyson <btyson@taylorenglish.com>
Sent: Friday, May 14, 2021 5:27 PM
To: Hedgecock, Lyle F. <LHedgecock@mofo.com>; Conaway, Jenna B. <JConaway@mofo.com>; cheryl.ringer@fultoncountyga.gov; vrusso@robbinsfirm.com; cmiller@robbinsfirm.com; adenton@robbinsfirm.com; Jonathan Crumly <jcrumly@taylorenglish.com>; James Balli <jballi@taylorenglish.com>; Dal Burton <dburton@taylorenglish.com>; Diane LaRoss <dlaross@taylorenglish.com>; Bryan Jacoutot <bjacoutot@taylorenglish.com>; Loree Anne Paradise <lparadise@taylorenglish.com>; Cross, David D. <DCross@mofo.com>; Bruce Brown <bbrown@brucepbrownlaw.com>; Rob McGuire <ramp@lawram.com>; Cary Ichter <CIchter@IchterDavis.com>; Halsey G. Knapp, Jr. <hknapp@khlawfirm.com>; Adam M. Sparks <sparks@khlawfirm.com>; Ascarrunz, Veronica <VAscarrunz@mofo.com>; Kaiser, Mary <MKaiser@mofo.com>; Manoso, Robert W. <RManoso@mofo.com>; Brogan, Eileen M. <EBrogan@mofo.com>; Josh Belinfante <Josh.Belinfante@robbinsfirm.com>; Bryan Tyson <btyson@taylorenglish.com>
Subject: RE: Curling v. Raffensperger, No. 1:17-cv-2989-AT (N.D. Ga.)

External Email

All:

Please find attached State Defendants' letter responding to Mr. Cross's letter and outlining our discovery positions as we discussed.

Have a great weekend,

Bryan



Bryan P. Tyson

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From: Hedgecock, Lyle F. <LHedgecock@mofo.com>

Sent: Tuesday, May 11, 2021 10:02 PM

To: Conaway, Jenna B. <JConaway@mofo.com>; Bryan Tyson <btyson@taylorenGLISH.com>; cheryl.ringer@fultoncountyga.gov; vrusso@robbinsfirm.com; cmiller@robbinsfirm.com; adenton@robbinsfirm.com; Jonathan Crumly <jcrumly@taylorenGLISH.com>; James Balli <jballi@taylorenGLISH.com>; Dal Burton <dburton@taylorenGLISH.com>; Diane LaRoss <dlaross@taylorenGLISH.com>; Bryan Jacoutot <bjacoutot@taylorenGLISH.com>; Loree Anne Paradise <lparadise@taylorenGLISH.com>; Cross, David D. <DCross@mofo.com>; Bruce Brown <bbrown@brucebrownlaw.com>; Rob McGuire <ram@lawram.com>; Cary Ichter <CIchter@IchterDavis.com>; Halsey G. Knapp, Jr. <hknapp@khlawfirm.com>; Adam M. Sparks <sparks@khlawfirm.com>; Ascarrunz, Veronica <VAscarrunz@mofo.com>; Kaiser, Mary <MKaiser@mofo.com>; Manoso, Robert W. <RManoso@mofo.com>; Brogan, Eileen M. <EBrogan@mofo.com>

Subject: Curling v. Raffensperger, No. 1:17-cv-2989-AT (N.D. Ga.)

Mr. Tyson,

Please find attached a letter from Mr. Cross concerning discovery.

Best,

LYLE HEDGECK

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